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Shein Distribution Corporation,
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Zoetop Business Company, Limited,
and George Chiao*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

KRISTA PERRY, an individual;
LARISSA MARTINEZ, an individual;
JAY BARON, an individual; RACHEL
PFEFFER, an individual; DIRT BIKE
KIDZ, Inc., a California corporation;
ESTELLEJOYLYNN, LLC, a New
Jersey limited liability company;
JESSICA LOUISE THOMPSON
SMITH, an individual; LIV LEE, an
Individual,

Plaintiffs,

v.

SHEIN DISTRIBUTION
CORPORATION, a Delaware
corporation; ROADGET BUSINESS
PTE., LTD; ZOETOP BUSINESS CO.,
LTD.; and GEORGE CHIAO,

Defendants.

CASE NO. 2:23-CV-05551-MCS-JPR

DISCOVERY MATTER

**NOTICE OF MOTION AND
MOTION TO COMPEL
PLAINTIFFS' DISCOVERY
RESPONSES AND ENTRY OF A
PROTECTIVE ORDER**

Date: September 25, 2025
Time: 10:00 a.m.
Place: Courtroom 880
Judge: Hon. Jean P. Rosenbluth

Discovery Cutoff: October 6, 2025

Pretrial Conference: February 9, 2026

Trial: February 24, 2026

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD

Please take notice that on September 25, 2025 at 10:00 a.m., or as soon as the matter may be heard, before the Honorable Jean P. Rosenbluth in Courtroom 880 of the Roybal Federal Building and United States Courthouse, located at 255 E. Temple St., Los Angeles, CA, 90012, Defendants will move, and hereby do move, for an order (1) compelling Plaintiffs to (a) produce all documents they have previously agreed to produce, (b) produce all non-privileged documents responsive to Defendants' First Set of Requests for Production Nos. 16, 21, 25, and 27, and (c) supplement their responses to Defendants' First Set of Interrogatories Nos. 1-4 and 6-11, and (2) entering Defendants' proposed protective order. The parties have met and conferred on these issues pursuant to Local Rule 37-1.

This Motion is based on the accompanying Joint Stipulation pursuant to Local Rule 37-2, the Declaration of Ali R. Rabbani and the exhibits thereto, the files and records related to this case, and on such further argument that may be submitted to the Court.

DATED: August 27, 2025

Respectfully submitted:

By: /s/ Ali R. Rabbani
Ali R. Rabbani

Attorney(s) for Defendants